

The Honorable Richard A. Jones

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

AEGEAN MARINE PETROLEUM S.A.,  <div style="text-align: center;">Plaintiff,</div>	)	IN ADMIRALTY  Case No. 2:15-cv-00172-RAJ
vs.	)	<b>VERIFIED STATEMENT OF INTEREST AND NOTICE OF RESTRICTED APPEARANCE</b>
M/V KAVO PLATANOS, her tackle, boilers, apparel, furniture, engines, appurtenances, etc.,  <div style="text-align: center;">and</div> Certain Bunkers on board the M/V KAVO PLATANOS,  <div style="text-align: center;">Defendants <i>in rem</i>,</div>	)	
and	)	
CANPOTEX SHIPPING SERVICES LTD., <i>et al.</i> ,  <div style="text-align: center;">Defendants and Garnishee.</div>	)	

Pursuant to Rules C(6) and E(8) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, Indy Maritime S.A., ("Indy"), as Claimant to the *in rem* defendant vessel KAVO PLATANOS, by and through undersigned counsel, hereby enters a restricted appearance in this matter for the sole purpose of defending against the *in rem* claim

Case No.: 2:15-CV-00172-RAJ  
 VERIFIED STATEMENT OF INTEREST AND NOTICE OF  
 RESTRICTED APPEARANCE - 1

KEESAL, YOUNG & LOGAN  
 1301 FIFTH AVENUE, SUITE 3300  
 SEATTLE, WASHINGTON 98101  
 (206) 622-3790

1 made against the M/V KAVO PLATANOS without appearing generally for the  
2 purposes of any other claim. Indy makes this restricted appearance on the basis  
3 that it is the owner of the M/V KAVO PLATANOS with the right to demand its  
4 restitution and to defend this action. This restricted appearance is made with a full  
5 reservation and preservation of any and all rights, defenses, remedies and  
6 limitations available to Indy and the M/V KAVO PLATANOS.

7 DATED this 19<sup>th</sup> day of February, 2015.

8  
9 s/ Philip R. Lempriere  
10 Philip R. Lempriere, WSBA No. 20304  
11 Attorneys for Claimant  
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**ATTORNEY VERIFICATION/CERTIFICATION**

I, PHILIP R. LEMPRIERE, an attorney at Law of the State of Washington and a Member of the Bar of this Court verify, certify and state:

1. I am a shareholder with the law firm of Keesal, Young & Logan, attorneys for Claimant Indy Maritime S.A. I have read the foregoing Verified Statement of Interest and Notice of Restricted Appearance and know the contents thereof, and the same is true to the best of my knowledge, information and belief.

2. The sources of my information and the grounds for my belief are communications, information and documentation provided by our client.

3. The reason this Verification/Certification is made by an attorney and not by Claimant is because Claimant is a foreign entity, none of whose officers and/or managers familiar with this matter are presently within this Judicial District. In light of these circumstances, I have been authorized by Claimant to make this verification on their behalf.

4. I hereby verify and certify that the foregoing statements made by me are true. I am aware that if any of these statements made by me are willfully false, I am subject to contempt of Court.

DATED this 19<sup>th</sup> day of February, 2015 at Seattle, Washington.

s/ Philip R. Lempriere  
Philip R. Lempriere

**CERTIFICATE OF SERVICE**

The undersigned certifies under penalty of perjury under the laws of the State of Washington that, on the date given below, (he/she) caused to be served a copy of VERIFIED STATEMENT OF INTEREST AND NOTICE OF RESTRICTED APPEARANCE upon the following person(s) via First Class U.S. mail, postage prepaid:

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Attorneys for Specially Appearing  
Defendant Canpotex Shipping Services  
Ltd.

J. Stephen Simms, Esq.  
Simms Showers LLP  
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Attorneys for Plaintiff

DATED this 19<sup>th</sup> day of February, 2015, at Seattle, Washington.

  
Marcee Stone-Vekich

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